

ORIGINAL

BEFORE THE
Federal Communications Commission

WASHINGTON, D.C. 20554

RECEIVED

MAY 14 1993

FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY
 PR Docket No. 93-39

In the Matter of

AMENDMENT OF PARTS 80, 87 AND
 94 OF THE COMMISSION'S RULES
 GOVERNING THE PRIVATE RADIO
 SERVICES

To: The Commission

COMMENTS OF PACTEL PAGING

PacTel Paging ("PacTel"), by its attorneys, hereby submits its Comments in support of the Commission's Notice of Proposed Rulemaking amending the Commission's Rules to, inter alia, eliminate certain reporting requirements for licensees of Part 94 operational fixed microwave systems ("NPRM").

1. PacTel is a licensee under Part 94 of the Commission's Rules. PacTel has Part 94 point-to-point microwave systems in San Francisco and San Diego, California. PacTel utilizes these facilities to provide one-way paging services to its subscribers.

2. PacTel completely supports the Commission's NPRM. PacTel agrees with the Commission that there is no useful purpose served by requiring carriers to maintain records on station maintenance, transmitter measurements and antenna inspections to

No. of Copies rec'd
 List A B C D E

045

ensure compliance with the Commission's Rules. These station record requirements add little to ensure that the licensee is in conformance with the Commission's Rules. Indeed, if the licensee does not comply with the Commission's Rules regarding emission requirements, it is extremely doubtful that they would follow the station recordkeeping requirements. In any event, as the Commission points out in the NPRM, regardless of the recordkeeping requirements elimination of these requirements would not harm the public interest because the licensee is nonetheless required to maintain the facilities in accordance with the Commission's Rules at all times. Therefore, these requirements can be removed without harming the public interest.

3. The foregoing premises having been duly considered, PacTel respectfully requests that the Commission proceed with the elimination of these recording provisions.

Respectfully submitted,

PacTel Paging

By: 

Mark A. Stachiw
Carl W. Northrop
Its Attorneys

PacTel Paging
Suite 800
12221 Merit Drive
Dallas, Texas 75251
(214) 458-5200

Bryan Cave
Suite 700
700 13th St., N.W.
Washington, D.C. 20005
(202) 508-6000

May 14, 1993